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November 22, 2002

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest
Communications International Inc. for
Authorization to Provide In-Region, InterLATA
Service in the States of Colorado, Idaho, Iowa,
Montana, Nebraska, North Dakota, Utah,
Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing at the request of Commission staff to respond to questions raised concerning Qwest's UNE-P order volumes as well as AT&T's 2001 UNE-P trial in Minnesota.

UNE-P Order Volumes

Commission staff asked Qwest to identify, on a region-wide basis, the percentage and total number of Qwest Wholesale orders that are UNE-P orders. Qwest received 618,019 service orders from November 2001 to October 2002 that were included in the OP-3 Performance Measure result (Installation Commitments Met).¹ Of those service orders, 89,618, or 14.5%, were UNE-P POTS service orders.

¹ The service orders measured by OP-3 include the following order types: Change, New, and Transfer orders.

AT&T's UNE-P Trial

AT&T's UNE-P trial in Minnesota took place in 2001. Although the Second Errata Affidavit of John Finnegan indicates that AT&T "conducted its 'friendly' test on Qwest's OSS beginning on May 22, 2001," final certification of AT&T's UNE-P EDI effort took place on June 15, 2001. This allowed AT&T to begin production ordering for the Minnesota trial on June 18, 2001. During the Minnesota hearing on OSS, Mr. Finnegan testified that Phase I of the trial concluded in mid-October, and Phase II of the trial began in late-November, 2001.² Qwest retired IMA EDI release 6.0, which AT&T tested for the UNE-P MN trial, on December 7, 2001. Therefore, actual transactional testing for both phases of the trial was conducted between June 18 and December 7, 2001.

The following table provides the volume of flow-through and manually processed orders for each phase of the AT&T UNE-P trial. The manually processed orders below reflect all orders that were ineligible for flow-through that were manually processed, in addition to all orders that qualified for flow-through but were manually processed.

| 2001 Test Phase | Flow-Through Orders | Manually Processed Orders | Totals |
|------------------------|----------------------------|----------------------------------|---------------|
| Phase I | 1215 | 4335 | 5550 |
| Phase II | 1079 | 518 | 1597 |
| Totals: | 2294 | 4853 | 7147 |

In compiling these numbers, Qwest realized that the parties in the Minnesota hearing made a calculation error in the results of Phase I of the test. Therefore, the results reported in Qwest's November 19, 2002 *ex parte* for Phase I of the AT&T Minnesota UNE-P Test should be changed to reflect a slightly higher manual processing error rate, as explained more fully in the next paragraph.

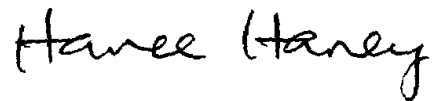
² See Transcript of Hearing, October 3, 2002 (Finnegan) at 137-38 (attached to Qwest *ex parte* of November 18, 2002).

During the hearing, Mr. Finnegan was asked to add up the total denominator for the months between June and October, which he calculated to be 4,243, rather than the actual result of 5,550, which represented the total number of LSRs submitted during that period.³ However, Mr. Finnegan correctly calculated the number of flow-through LSRs, 1,215.⁴ The number of manually-handled LSRs should have been (and is) 4,335 ($5,550 - 1,215 = 4,335$). AT&T reported that the error rate for LSRs was 2.19% for Phase I.⁵ The total number of LSRs resulting in mistakes was 121 ($5,550 \times .0219 = 121$). If all mistakes are assumed to be the result of manual handling, then 2.80% of manually-handled LSRs (not 2.19%, as Mr. Finnegan stated) contained errors ($121 / 4,335 = .0280$).

This correction does not affect the results reported in Qwest's November 19, 2002, *ex parte* for Phase II of the test and they remain correct. During Phase II of the test, AT&T submitted 1,597 LSRs.⁶ During Phase II, Qwest's accuracy rate, as reported by AT&T, was 99.49%.⁷ Even if all LSRs that were not provisioned correctly are attributed to manual order processing errors, Qwest's result was 98.46% (a 1.54% error rate) for Phase II – still well above AT&T's unilaterally-imposed 95% benchmark.⁸

The twenty-page limit does not apply to this filing.

Respectfully submitted,



cc: E. Yockus
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G. Remondino
J. Myles
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³ Exhibit 1 of November 19, 2002 *ex parte*, Tr. 10/3/02 (Finnegan) at 139.

⁴ Exhibit 1 of November 19, 2002 *ex parte*, Tr. 10/3/02 (Finnegan) at 139.

⁵ Exhibit JFF-UNE-P-3 at 2; and Exhibit 1 of November 19, 2002 *ex parte*, Tr. 10/3/02 (Finnegan) at 139.

⁶ Exhibit 1 of November 19, 2002 *ex parte*, Tr. 10/3/02 (Finnegan) at 141.

⁷ Exhibit JFF-UNE-P-2 at 2; and Exhibit 1 of November 19, 2002 *ex parte*, Tr. 10/3/02 (Finnegan) at 136.

⁸ Exhibit 1 of November 19, 2002 *ex parte*, Tr. 10/3/02 (Finnegan) at 142.

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